

APPENDIX A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE, *et*
al.,

Plaintiffs,

v.

TATE REEVES, in his official capacity as
Governor of the State of Mississippi, *et al.*,

Defendants.

No. 3:23-cv-272-HTW-LGI

DECLARATION OF JONATHAN D. BROOKS

I, Jonathan D. Brooks, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I make this declaration based on my personal knowledge of the above-referenced action and in connection with the United States' Statement of Interest.
2. I am a geographer in the Office of Litigation Support Services of the Civil Rights Division at the United States Department of Justice. I have served in that capacity for the Department for 29 years. As a geographer, I am familiar with the use of geographic information systems (GIS), Census data, and other spatial information in support of the Department's ongoing enforcement activities.
3. This declaration sets forth the methodology I employed to draw the boundaries of the Capitol Complex Improvement District as set forth in HB 1226 (2017) and in HB 1020 (2023). I relied on the legal descriptions as set forth in Section 8 of HB 1020 (2023), for each set of boundaries.

4. In recreating the boundaries lines for the Capitol Complex Improvement District as set forth in HB 1226 (2017), I followed the step-by-step legal descriptions provided in Section 8 of HB 1020 (2023).
5. In recreating the boundaries lines for the Capitol Complex Improvement District as set forth in Section 8 of HB 1020 (2023), I followed the step-by-step legal descriptions provided in the Section 8 of HB 1020 (2023).
6. To create Attachment A, I displayed the two sets of CCID boundaries over a street map of the City of Jackson, MS.
7. To create Attachment B, I overlaid the boundary lines that I had created from the legal description for both HB 1226 and HB 1020 over Census 2020 blocks and displayed the Non-Hispanic Black population percentages using four breaks (35%, 50%, 65%, 100%) represented by the colors white, yellow, orange, and red respectively.
8. To create Attachment C, I narrowed the focus of Attachment B to the areas immediately surrounding the CCID.
9. In determining the racial demographics of population in the CCID as configured by HB 1226 using 2020 Census data, I overlaid the boundary lines that I had created from the legal description over Census 2020 blocks contained in our mapping software which contained the official PL94-171 2020 Census block statistics. The result is:

Total Pop:	14,374
WhiteNH:	6,184 (43.0%)
BlackNH:	7,183 (50.0%)

- a. It should be noted that in drawing the boundaries for the HB 1226 as described in the submitted boundary descriptions, five census blocks were split.
 - i. Only one of the five census blocks had population.
 1. This block contained a total of 21 people with a breakdown of:

twelve WhiteNH persons, five BlackNH persons, one Hispanic person, and thee American Indian/Alaska Native NH persons).

2. This block is located on the east side of the district and was drawn using the following boundary description bullet points:

- a. Then north along the west bank of the Pearl River
(extending along the southern boundary of LeFleur's Bluff State Park) until it reaches a point on such bank determined by extending the east curb line of Ridgewood Road south until it meets the bank of the Pearl River;
- b. Then north along such line determined by extending the east curb line of Ridgewood Road and continuing along such curb line until it reaches the northern drainage ditch of Eastover Drive.

10. In determining the racial demographics of population in the CCID as configured by HB 1020 using 2020 Census data, I overlaid the boundary lines that I had created from the legal description over Census 2020 blocks in our mapping software which contained the official PL94-171 Census Block statistics. The result is:

CCID District Statistics:	
Total Pop:	26,457
WhiteNH%	12,698 (48.0%)
BlackNH%	12,038 (45.5%)

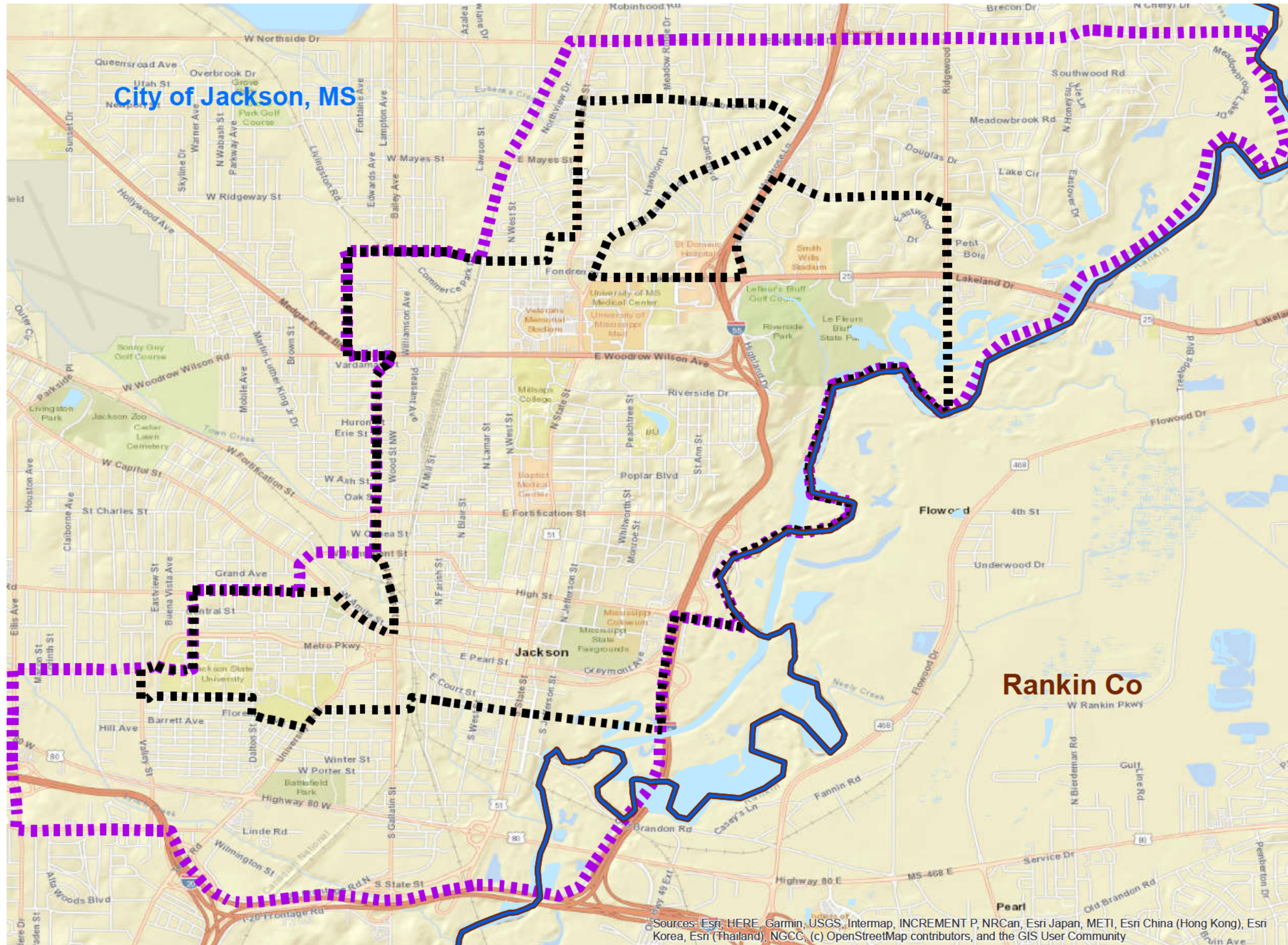
I declare under penalty of perjury that the forgoing is true and correct.






Executed on this the 5th day of December 2023.

/s/ *Jonathan D Brooks*
JONATHAN D. BROOKS

ATTACHMENT A

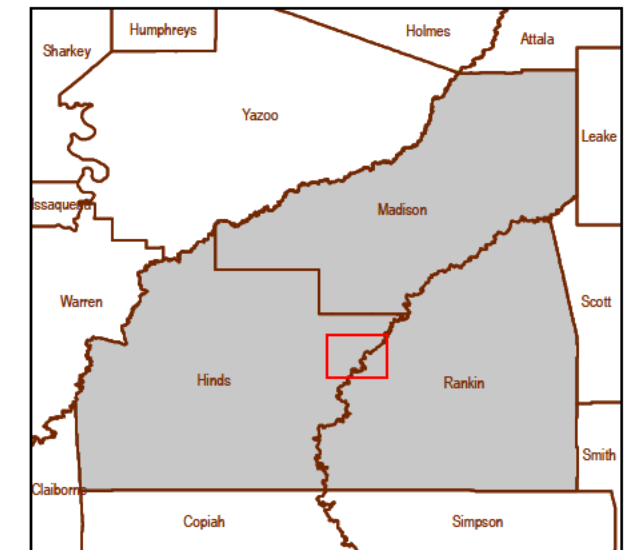
Capitol Complex Improvement District Original and Revised Boundaries City of Jackson, Mississippi



-  CCID (HB 1226)(2017)
-  CCID (HB 1020)(2023)
-  City of Jackson, MS
-  County
-  Water



0 0.25 0.5 1 Miles

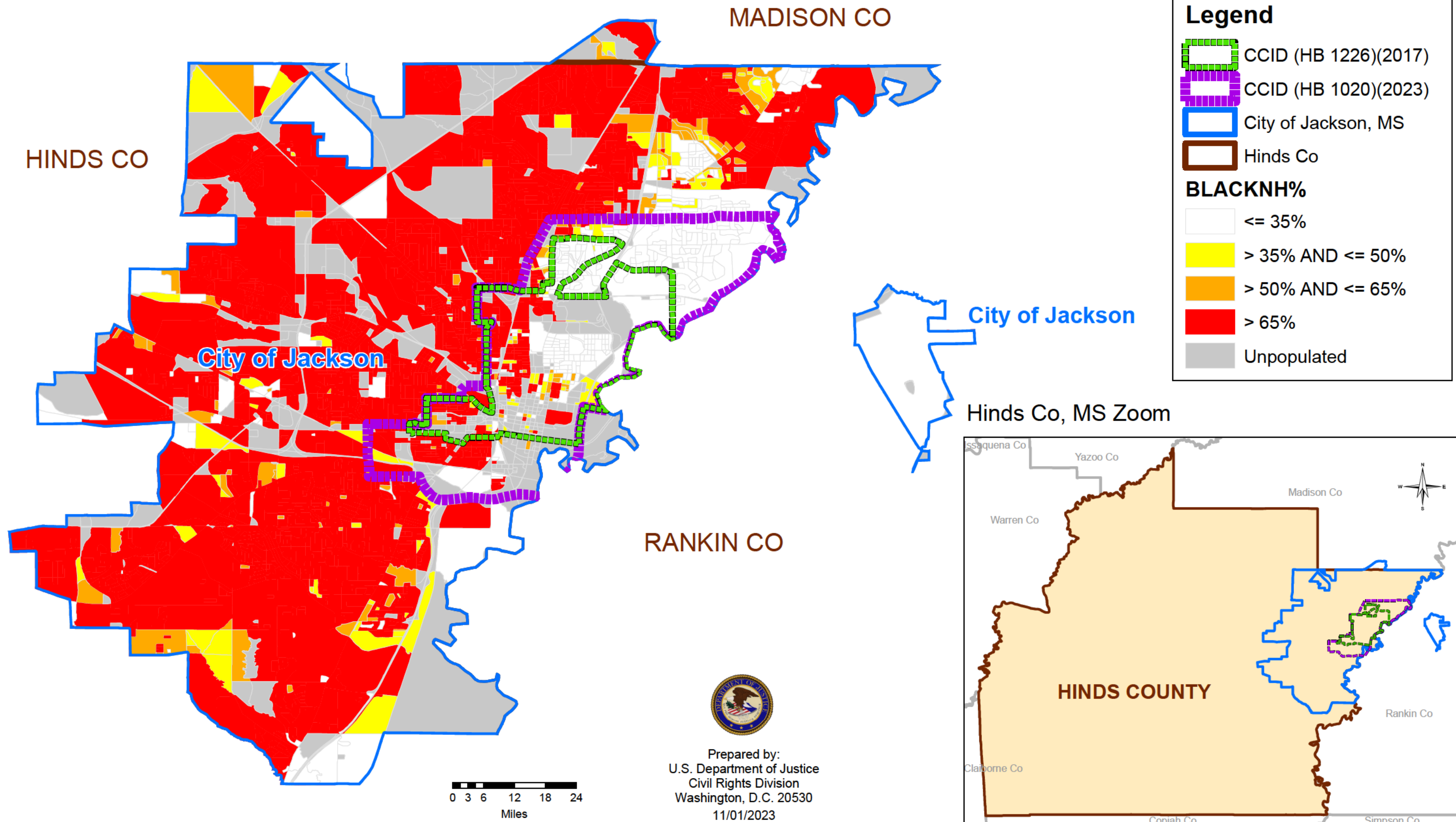


Prepared by:
U.S. Department of Justice
Civil Rights Division
Washington, D.C. 20530
11/27/2023

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

ATTACHMENT B

Percent BlackNH Population by 2020 Census Block City of Jackson, Mississippi - Original and Revised CCID



ATTACHMENT C

Percent BlackNH Population by 2020 Census Block City of Jackson, Mississippi - Original and Revised CCID

